IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| UNITED STATES OF AMERICA | : | DATE FILED: | |
|--------------------------|---|----------------|--|
| v. | : | CRIMINAL NO. : | |

:

GHANDI RIDDICK : VIOLATIONS:

: 18 U.S.C. § 1951 (conspiracy to commit

Hobbs Act robbery - 1 count)
21 U.S.C. § 846 (conspiracy to

possess with intent to distribute 100

kilograms or more of marijuana -

1 count)

: 18 U.S.C. § 924(c)(1) (use and carrying of a firearm during and in relation to crime of

: violence and a drug trafficking crime -

1 count)

: 18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

- 1. Congress has found by the enactment of the Drug Abuse Prevention and Control Act of 1970 in specific congressional findings and declarations (codified at 21 U.S.C. § 801) that local distribution and possession of illegal controlled substances have a direct effect upon interstate commerce and contribute to the swelling of the interstate traffic and distribution of such illegal substances.
- 2. Marijuana is a Schedule I controlled substance under the Drug Abuse Prevention and Control Act.

- 3. Walter L. Sellars, a/k/a "Larry," a drug trafficker, charged elsewhere, lived at 1019 Red Lion Road in Philadelphia, Pennsylvania with S.D. and their child.
- 4. Prior to and on or about November 8, 2004, Walter Sellars, possessed in excess of 100 kilograms of marijuana for resale at 1019 Red Lion Road in Philadelphia, Pennsylvania, which he stored in his garage.
- 5. On or about November 8, 2004, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

GHANDI RIDDICK

conspired and agreed together, and with others known and unknown to the grand jury, including but not limited to Meighan Hand, charged elsewhere, to commit robbery, which robbery would obstruct, delay and affect commerce and the movement of articles and commodities in commerce, in that defendant RIDDICK and others conspired to unlawfully take and obtain money and marijuana in the presence of another, that is, S. D. and her child, against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the person of S.D. and her child, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

MANNER AND MEANS

It was a part of the conspiracy that:

6. Defendant GHANDI RIDDICK and others known and unknown to the grand jury agreed to unlawfully take and obtain money and marijuana by robbery from Walter L. Sellars, a drug trafficker, and S.D. at their residence located at 1019 Red Lion Road in Philadelphia, Pennsylvania.

OVERT ACTS

In furtherance of this conspiracy, in the Eastern District of Pennsylvania and elsewhere, defendant GHANDI RIDDICK and others committed the following overt acts:

- On or about a date prior to November 8, 2004, coconspirator Meighan
 Hand told another individual that Walter Sellars had received a shipment of marijuana at 1019
 Red Lion Road in Philadelphia, Pennsylvania.
- On or about November 8, 2004, coconspirator Meighan Hand spoke to Walter Sellars and told him that she wanted to deliver a gift to S.D. and their child at 1019 Red Lion Road in Philadelphia, Pennsylvania.
- 3. On or about November 8, 2004, coconspirator Meighan Hand entered 1019 Red Lion Road in Philadelphia, Pennsylvania with defendant GHANDI RIDDICK and other individuals, who brandished firearms, forced S.D. and her child onto a bed, placed a quilt over their heads, ransacked the residence, and stole money from S.D.
- 4. The same day, defendant GHANDI RIDDICK and persons known and unknown to the grand jury stole bales of marijuana from the garage at 1019 Red Lion Road in Philadelphia, Pennsylvania.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY CHARGES THAT:

 On or about November 8, 2004, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

GHANDI RIDDICK

conspired and agreed, with others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

MANNER AND MEANS

It was a part of the conspiracy that:

2. The defendant possessed marijuana for resale in the Philadelphia area.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

- On or about November 8, 2004, defendant GHANDI RIDDICK and other individuals removed packages of marijuana from a garage located at 1019 Red Lion Road in Philadelphia, Pennsylvania.
- 2. On or about November 8, 2004, defendant GHANDI RIDDICK possessed marijuana for resale.

All in violation of Title 21, United States Code, Section 846.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 8, 2004, in Philadelphia, in the Eastern District of

Pennsylvania, defendant

GHANDI RIDDICK

knowingly used and carried, and aided and abetted the use and carrying of, a firearm during and

in relation to a crime of violence, for which he may be prosecuted in a court of the United States,

that is, conspiracy to commit Hobbs Act robbery in violation of Title 18, United States Code,

Section 1951(a), and a drug trafficking crime, for which he may be prosecuted in a court of the

United States, that is, conspiracy to distribute 100 kilograms or more of marijuana, in violation

of Title 21, United States Code, Section 846, for which he may be prosecuted in a court of the

United States,

In violation of Title 18, United States Code, Section 924(c)(1).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN

United States Attorney

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